

1           **MATTHEW PHILLIP SOLAN**  
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7       *Plaintiff in propria persona*

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DISTRICT OF ARIZONA	
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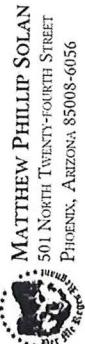
6           **IN THE UNITED STATES DISTRICT COURT**  
 7           **FOR THE DISTRICT OF ARIZONA**

8       Matthew Phillip Solan,  
 9    *Plaintiff,*  
 10    *v.*  
 11       State of Arizona, *et al.*,  
 12    *Defendants.*

Case no. CV24-02061-PHX-JJT-DMF  
**PLAINTIFF'S RESPONSE TO  
 DEFENDANTS' OPPOSED MOTION  
 FOR ADDITIONAL TIME TO  
 RESPOND TO MOTION FOR  
 PRELIMINARY INJUNCTION**

12       Plaintiff opposes Defendants' motion for an extension of time (Doc. 18) ("Extension  
 13 Request") to respond to his Motion for Preliminary Injunction (the "MPI"). Plaintiff  
 14 would normally acquiesce to a reasonable extension request, as his litigation history  
 15 demonstrates. However, the MPI, which Defendants seek to delay, requests expedited  
 16 consideration due to ongoing, irreparable harm. Extending the deadline from March 31 to  
 17 April 18—over 150% of the default 14-day response period under LRCiv 7.2(c)—unduly  
 18 prejudices Plaintiff by unjustly prolonging the serious harm Defendants are causing.

19       Defendants claim in their Extension Request that one of their attorneys has a medical  
 20 appointment on March 31; however, in their March 21 email to Plaintiff's ranch manager,  
 21 they gave a completely different reason, to-wit: "the time involved in working with  
 22 Defendants to respond to the many factual allegations contained in [the MPI]."



1       In other words, Defendants wish to generate factual testimony—a task they've had  
 2 ample time to prepare for. Most, if not all of Plaintiff's assertions in the MPI have been  
 3 public or known to Defendants for months (if not years, from Plaintiff's prior litigation).

4       Further, the Arizona Attorney General's Office has extensive staffing resources, and  
 5 in Plaintiff's prior suit against ASH, they simply added additional Assistant Attorneys  
 6 General when their workloads increased. Defendants' stated reasons do not justify a 2+  
 7 week delay in a case where Plaintiff is actively suffering serious psychological harm and  
 8 demonstrable violations of his civil rights. The State's delay in coordinating with its own  
 9 employees is not good cause to delay essential preliminary relief.

10      Finally, Defendants know Plaintiff is confined in the Arizona State Hospital, and that  
 11 ASH does not provide email access to its Patients. Sending time-sensitive  
 12 communications to a monitored company email account—rather than using the publicly  
 13 available ASH patient phone line—was improper.

14      For the foregoing reasons, Plaintiff respectfully asks the Court to deny the requested  
 15 extension and require Defendants to respond within the 14-day window provided under  
 16 the LRCiv 7.2(c); or, in the alternative, provide Defendants a more conservative  
 17 extension, such as 3-10 calendar days.

18      **SIGNED, SEALED, AND DATED** this 25th day of March, 2025.




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22

**Matthew Phillip Solan**  
Plaintiff in *Pro. Per.*

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1                   **CERTIFICATE OF SERVICE**

2                   I certify that on March 25th, 2025, a copy of the foregoing document was deposited  
3 in the U.S. mail, addressed to:

4                   Ann Hobart and Jordan Kendall  
5                   Assistant Attorneys General  
6                   Arizona Attorney General's Office  
7                   2005 N. Central Avenue  
8                   Phoenix, Arizona 85004

9                   *Attorneys for Defendants*



Matthew Phillip Solan

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